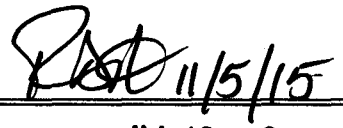


AO 91 (Rev. 11/11) Criminal Complaint



UNITED STATES DISTRICT COURT

for the

Southern District of Texas

 United States Court
 Southern District of Texas
 FILED

NOV 5 2015

United States of America

v.

Jonas TIZZANO and
Christopher JONES

Case No.

 David J. Bradley, Clerk of Court
 H15-1531M

 Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

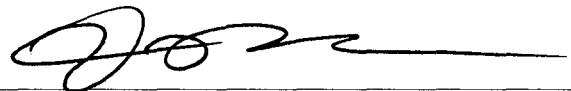
 On or about the date(s) of October 15, 2015 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:
*Code Section**Offense Description*Title 18, United States Code,
Sections 1951(a) and 2

Aiding and Abetting Interference with Commerce by Robbery

Title 18, United States Code,
Sections 924(c) and 2Aiding and Abetting Use and Carrying of a Firearm in Furtherance of a Crime
of Violence

This criminal complaint is based on these facts:

see attached affidavit

☒ Continued on the attached sheet.


Complainant's signature

ATF Special Agent Dominic Rosamilia

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/5/15City and state: Houston, Texas


Judge's signature

John R. Froeschner, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Dominic Rosamilia, Affiant, having been duly sworn, do hereby state the following:

1. I am an investigative or law enforcement officer within the meaning of Section 2510(7) of Title 18, United States Code, that is an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

2. I am a Special Agent (SA) of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, and have been so employed since April of 2009. I graduated from the Federal Law Enforcement Training Center and the ATF National Academy in Glynco, Georgia. I am presently a member of Houston Group I of the ATF. As a Special Agent of the ATF, my duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of federal laws, particularly those laws found in Title 18 of the United States Code. I have received additional law enforcement training at Chesterfield County Police Department. I was employed by Chesterfield County Police for thirteen years. While at Chesterfield County Police Department

I was assigned to investigations, vice and narcotics, community policing, patrol and was a Sergeant. I have acted as an instructor in several topics throughout the state of Virginia to include Search and Seizure, and Basic Law. I have requested and executed over 100 search warrants. I am a graduate of The State University of New York at Buffalo with a bachelor degree in Health and Human Services. My current assignment with Houston Group I, involves the investigation of individuals who traffic firearms to individuals, violent criminals, criminal organizations such as street gangs, and drug trafficking organizations. I have used cooperating informants, undercover agents, pen register/trap and trace devices, video surveillance, wiretaps, GPS tracking devices, and audio surveillance, among other law enforcement techniques, in the course of my career with ATF.

3. This affidavit is being submitted in support of a criminal complaint and arrest warrant. Your Affiant states that there is probable cause to believe that Jonas TIZZANO, and Christopher JONES have committed the offenses of Aiding and Abetting Interference with Commerce by Robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, and Aiding and Abetting Use and Carrying of a Firearm in Furtherance of a Crime of Violence, in violation of Title 18, United States Code, Sections 924(c) and 2.

4. On October 15, 2015, Houston Police Department (HPD) North Tactical Units along with Agents from Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) were conducting surveillance on a vehicle occupied by known robbery suspects. This vehicle turned into a large parking lot in the 7800 Block of W. Tidwell, located in Houston, Texas.

5. The vehicle occupants, Jonas TIZZANO, Christopher JONES, and Martin RYANS, were observed entering the Cash Store Title Loans and Cash Advances located at 7844 W. Tidwell. The Cash Store is a multi-state business operating branches in seven different states. One suspect wearing bright yellow/green traffic vest, later identified as TIZZANO, held the door for the other two suspects, later identified as JONES and RYANS, both of whom were seen to display handguns as they entered the business. HPD North Tactical Units responded and engaged the suspects as they exited the business. Police discharged their weapons and JONES and RYANS were shot. TIZZANO fled on foot around the corner of the business and into another commercial business strip center.

6. TIZZANO entered the business of Best Computer USA located at 7758 W. Tidwell # 136 and climbed shelving to enter the ceiling space. TIZZANO tried to find an exit from the ceiling area causing damage to the ceiling tiles and water

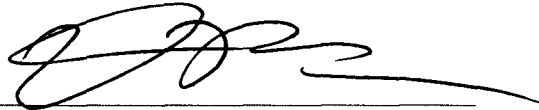
pipes. Police held both scenes and set a perimeter. HPD SWAT and Hostage Negotiation Team (HNT) responded to the scene. HNT used speakers to provide a surrender plan. TIZZANO continued his movements in the ceiling and eventually fell through the ceiling tile striking the floor at which point he was placed under arrest. TIZZANO was searched incident to arrest and recovered from his person was over \$1,000 in United States currency.

7. After the scene was secured, Cash Store employees were interviewed and store surveillance video was reviewed. Based upon this information it was determined that TIZZANO, JONES, and RYANS entered the Cash Store, JONES and RYANS carrying handguns, and immediately approached the store employees, demanding at gun point that the employees surrender the store's cash. After having obtained approximately \$4,400 in United States currency from the store's employees, the three exited through the front of the store where they encountered law enforcement officers.

8. JONES was treated and transported to the hospital with multiple gunshot wounds. RYANS was pronounced dead at the scene by medical personnel.

Based on the foregoing facts, your affiant believes that probable cause exists for the issuance of a complaint and arrest warrant for Jonas TIZZANO, and Christopher JONES, charging them

with Aiding and Abetting Interference with Commerce by Robbery,
in violation of Title 18, United States Code, Sections 1951(a)
and 2, and Aiding and Abetting the Use and Carrying of a Firearm
in Furtherance of a Crime of Violence, in violation of Title 18,
United States Code, Sections 924(c) and 2.



DOMINIC ROSAMILIA
Special Agent
Bureau of Alcohol, Tobacco,
Firearms, and Explosives

Sworn to and subscribed before me this 5th day of
November, 2015, and I find probable cause.



JOHN R. FROESCHNER
United States Magistrate Judge